

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PURDUE RESEARCH FOUNDATION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 6:22-cv-119-ADA
	§	
GOOGLE LLC,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	

**AGREED MOTION TO TRANSFER TO
THE NORTHERN DISTRICT OF CALIFORNIA**

Plaintiff Purdue Research Foundation and Defendant Google LLC (together the “Parties”) hereby jointly move the Court for an order transferring this matter to the United States District Court for the Northern District of California.

On June 9, 2022, Google filed an Opposed Motion to Transfer Venue to the Northern District of California Under 28 U.S.C. § 1404(a).

The Parties hereby jointly move the Court for an order transferring this matter to the United States District Court for the Northern District of California.

Plaintiff Purdue Research Foundation makes the following statement: “Nothing in this Agreed Motion shall be considered an admission by PRF (or its counsel) that the Western District of Texas, Waco Division, is a less convenient forum than the Northern District of California. PRF, as a non-profit research institution with limited litigation resources, is agreeing to the transfer solely to avoid the costs and delays associated with conducting venue related discovery, conducting a venue hearing and then subsequently facing the costs and delays

associated with an anticipated appeal by Google if the Court were to deny the pending Motion to Transfer.”

Defendant Google LLC makes the following statement: “Google believes transfer to the Northern District of California is appropriate for the reasons set forth in Defendant’s Opposed Motion Under 28 U.S.C. § 1404(a) to Transfer Venue to the Northern District of California, the supporting declarations, and the exhibits to those declarations. Google reserves its right to address any other issues in PRF’s statement when it is relevant and appropriate to do so.”

Date: June 16, 2022

Respectfully submitted,

/s/ Michael W. Shore

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Attorneys for Defendant Google LLC

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Research Foundation*

CERTIFICATE OF SERVICE

I certify that on June 16, 2022, I served the foregoing Agreed Motion to Transfer by notice of electronic filing on counsel of record registered as CM/ECF users.

/s/ Brian C. Banner

Brian C. Banner